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US Department of Energy

FEB - 2 REC'D

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February 2, 2011

Mr. Anthony J. Como
Director
Office of Policy and Siting, OE-20
Office of Electricity Delivery & Energy Reliability
U.S. Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

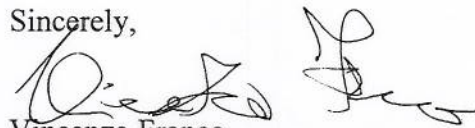
**Re: Application of Societe Generale Energy Corp. for Authorization to
Transmit Electricity to Canada, Docket No. EA-376**

Dear Mr. Como:

Enclosed for filing are an original and 15 conformed copies of the Application of Societe Generale Energy Corp. We request that you please date stamp and return the two additional copies enclosed herewith.

In accordance with 10 C.F.R. § 205.309, also enclosed is a check in the amount of \$500 payable to the Treasurer of the United States. A copy of the Application has been served upon the Secretary of the Federal Energy Regulatory Commission.

Sincerely,


Vincenzo Franco
Attorney for Societe Generale Energy Corp.

Enclosures

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY**

Societe Generale Energy Corp.) Docket No. EA_____

**APPLICATION OF SOCIETE GENERALE ENERGY CORP.
FOR AUTHORIZATION TO EXPORT ELECTRICITY TO CANADA**

Societe Generale Energy Corp., f/k/a Societe Generale Energie (USA) Corp. (Applicant), pursuant to section 202(e) of the Federal Power Act (FPA), 16 U.S.C. § 824a(e), and the Department of Energy (DOE) regulations contained in 10 C.F.R. § 205.300, *et seq.*, hereby files its Application for blanket authorization to export electricity from the United States to Canada for a term of ten years, effective from the date of the order granting this Application.

I. DESCRIPTION OF APPLICANT

The legal name of Applicant is Societe Generale Energy Corp. Applicant is a Delaware corporation and is a wholly-owned subsidiary of a French entity, Societe Generale Energie, which is a wholly-owned subsidiary of Société Générale, a bank formed under the laws of France. Applicant has no subsidiaries. Applicant requested and received market-based rate authorization from the Federal Energy Regulatory Commission (FERC) in September 2005¹ based on initial plans to engage in various energy-related marketing and trading activities. However, as a result of subsequent changes in energy and capital market conditions, Applicant put those plans on hold. Applicant has not engaged in any jurisdictional sales as of the date of this filing.

¹ See *Societe Generale Energie (USA) Corp.*, 112 FERC ¶ 61,248 (2005) (granting market-based rate authority).

Applicant does not own or control any electric generation, transmission, or distribution facilities in the United States and intends to operate as a power marketer. None of Applicant's affiliates owns or controls any electric generation, transmission, or distribution facilities in the United States, except for limited passive or non-controlling interests that affiliates of Applicant own in certain generation assets.

II. COMMUNICATIONS

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Director, Commodities Compliance
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III. STATE OF INCORPORATION

Applicant is incorporated under the laws of the State of Delaware and has its principal place of business in New York, NY. Applicant is currently authorized to do business in the following states: Alabama, Arizona, California, Colorado, Connecticut, Florida, Georgia, Illinois, Kentucky, Louisiana, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, New Hampshire, New Jersey, New Mexico, Nevada, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Vermont, Virginia, and Washington.

IV. JURISDICTION

Pursuant to section 202(e) of the FPA, DOE has jurisdiction over the action to be taken in this Application. No other known federal, state, or local government has jurisdiction over the action to be taken in this Application.

V. DESCRIPTION OF TRANSMISSION FACILITIES

Applicant seeks authority to transmit electricity to Canada as a power marketer over existing cross-border facilities, as well as any additional future facilities that are appropriate for third-party use. Exhibit C to this Application provides a description of the existing transmission facilities and their Presidential Permit numbers. Applicant will comply with the terms and conditions contained in the export authorizations issued for those cross-border facilities as well as other export limitations that the Department may deem appropriate for those facilities.

VI. TECHNICAL DISCUSSION

Applicant seeks authority to transmit electricity as a power marketer over existing cross-border facilities described in Exhibit C, as well as any additional future facilities that are appropriate for third-party use. Applicant does not currently own or control electric generation or transmission facilities in any wholesale market in interstate commerce or have a power supply system of its own on which its exports of power could have a reliability, fuel use, or system stability impact. Applicant will purchase the power to be exported from electric utilities and federal power marketing agencies pursuant to voluntary agreements. By definition, such power is surplus to the system of the generator; thus, the electric power that Applicant will export on either a firm or interruptible basis will not impair the sufficiency of the electric power supply within the United States. Moreover, Applicant's exports of electric energy to Canada will not impede or tend to impede the regional coordination of electric utility planning or operations.

Applicant will make all necessary commercial arrangements and will obtain any and all other regulatory approvals required in order to effect any power exports. All of the electricity exported by Applicant will be transmitted pursuant to arrangements with utilities that own or operate existing transmission facilities and will be consistent with the export limitations and other terms and conditions contained in the existing Presidential Permits and electricity export authorizations associated with those facilities. Applicant will comply with the terms and conditions contained in the authorizations issued for these cross-border facilities as well as any other export limitations that DOE may deem appropriate, consistent with DOE's orders authorizing exports of electric energy by power marketers.²

Applicant will schedule each transaction with the appropriate balancing authority in compliance with the reliability criteria, standards, and guidelines of the North American Electric Reliability Corporation (NERC) and its Regional Entities. Applicant will obtain all necessary transmission access for its exports over the existing facilities listed in Exhibit C,³ as well as any additional future facilities that are appropriate for third-party use, and will comply with all applicable statutes and implementing rules, regulations, and orders of DOE and FERC. The controls inherent in any transaction that complies with NERC requirements and DOE export limits on the transmission facilities listed in Exhibit C, and any additional future facilities that are appropriate for third-party

² See e.g. *Enron Power Marketing, Inc.*, FE Docket No EA-102 (Feb. 6, 1996) (authorization to export to Mexico); *Destec Power Services, Inc.*, FE Docket No. EA-113 (May 31, 1996) (same); *ProMark Energy, Inc.*, FE Docket No. EA-155 (Jan. 23, 1998) (authorization to export to Canada).

³ The location, voltage, owner, and the Presidential Permits under which the relevant border transmission facilities were constructed and are maintained are also set forth in Exhibit C.

use, are sufficient to ensure that exports by Applicant will not impede the coordinated use of transmission facilities within the meaning of section 202(e) of the FPA.

As noted in Order No. EA-102,⁴ DOE may utilize the reliability analyses performed in other export authorization proceedings for the transmission facilities listed in Exhibit C in order to make the findings required for a grant of export authority to Applicant. Because the proposed exports will take place over existing international transmission lines, Applicant submits that the requested authorization does not require the preparation of an environmental impact statement or an environmental assessment pursuant to the National Environmental Policy Act of 1969.

VII. PROCEDURES

This Application is consistent with the North American Free Trade Agreement and U.S. energy policy, and will foster development of a more efficient and competitive North American energy market. Applicant requests authority for export transactions through specified border facilities even though specific transactions may not yet have been negotiated. DOE has granted export authority to similarly situated power marketers, and Applicant agrees to abide by the general conditions set forth in such orders.⁵

⁴ *Enron Power Marketing Inc.*, FE Docket No. EA-102 (Feb. 6, 1996).

⁵ See, e.g., *Coral Power, LLC*, FE Docket No. EA 212 (Aug. 26, 2002).

VIII. EXHIBITS AND ATTACHMENTS

The signed verification of Governor Tipton, Secretary of Societe Generale Energy Corp., is attached to this Application.

In accordance with 10 C.F.R. § 205.303 (2010), the following exhibits are attached hereto and made part hereof:

Exhibit A	Not Applicable
Exhibit B	Legal Opinion
Exhibit C	Transmission Facilities (submitted in lieu of Maps)
Exhibit D	Not Applicable
Exhibit E	Not Applicable
Exhibit F	Not Applicable

Pursuant to 10 C.F.R. § 205.309 (2010), a copy of this Application is being provided to:

Federal Energy Regulatory Commission
Office of the Secretary
888 First Street, N.E.
Washington, DC 20426

IX. CONCLUSION

In consideration of the foregoing, Applicant requests approval of this Application for authorization to export electricity to Canada for a term of ten years, effective from the date of the order granting this Application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Vincenzo Franco', is written over a horizontal line.

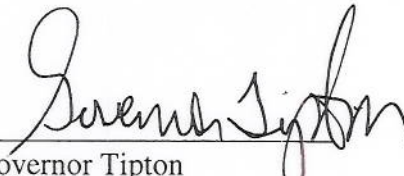
Vincenzo Franco
Attorney for Societe Generale Energy Corp.

Dated: February 2, 2011


VERIFICATION

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Governor Tipton, being duly sworn, states that he is the Secretary at Societe Generale Energy Corp., that he is authorized to execute this Verification, that he has read the above and foregoing document and is familiar with the contents thereof, and that all allegations of fact therein contained are true and correct to the best of his knowledge and belief.


Governor Tipton

Sworn to me this 26th day
of January, 2011



Notary Public

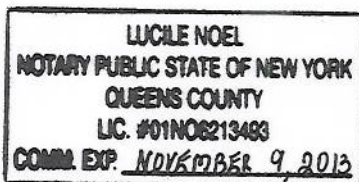


EXHIBIT B

Legal Opinion of Societe Generale Energy Corp. Counsel



SOCIETE GENERALE
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January 20, 2011

Office of Electricity Delivery & Energy Reliability
U.S. Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

Steven P. Heineman, Esq.
Managing Director
General Counsel

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Re: Application of Societe Generale Energy Corp. for
Authorization to Transmit Electricity to Canada

Ladies and Gentlemen:

I am General Counsel, SG Americas, and in that capacity am familiar with the legal affairs of Societe Generale in the United States. I am delivering this opinion in connection with the application dated January 13, 2011 (the "Application") by Societe Generale Energy Corp. (the "Applicant") for authorization to transmit electricity to Canada. The Applicant is an indirect, wholly owned subsidiary of Societe Generale.

For purposes of delivering this opinion, I have examined originals or copies, certified or otherwise identified to my satisfaction, of such documents, corporate records, certificates of public officials and other instruments as I have deemed necessary or appropriate, including but not limited to, the Certificate of Incorporation of the Applicant and the resolution of the Board of Directors of the Applicant approving the Application.

Based upon and subject to the foregoing and to the further limitations and qualifications hereinafter expressed, it is my opinion that:

1. The Applicant is organized as a corporation under the laws of Delaware.
2. On September 2, 2005, the Federal Energy Regulatory Commission granted the Applicant blanket authorization to sell electricity at market-based rates in interstate commerce in the United States.
3. The Applicant has the corporate power and capacity to execute and deliver the Application, and has taken all corporate action required to be taken by the Applicant to authorize the execution and delivery of the Application.



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4. The Applicant has complied with all pertinent federal and state laws relating to its current blanket authorization to sell electricity at market-based rates in interstate commerce in the United States.

I am a member of the Bar of the State of New York and the foregoing opinion is limited to the laws of the State of New York, the General Corporation Law of the State of Delaware and the federal laws of the United States, and I do not express any opinion with respect to the laws of any other jurisdiction.

This opinion is furnished by me in my capacity as General Counsel, SG Americas. It is solely for your benefit, and may not be relied upon by, or delivered or quoted to, any other person without my prior written consent. Except for the specific opinion set forth above, no opinion is expressed herein with respect to any other matters. The opinions expressed herein are as of the date hereof, and I undertake no obligation to advise you of any changes in applicable law or any other matters that may come to my attention after the date hereof that may affect any opinions expressed herein.

Very truly yours,

Steven P. Heineman

General Counsel
SG Americas

EXHIBIT C

Transmission Facilities

CROSS-BORDER TRANSMISSION FACILITIES

<u>Present Owner</u>	<u>Location</u>	<u>Voltage</u>	<u>Presidential Permit No.</u> ¹
Banger Hydro-Electric Company	Baileyville, ME	345-kV	PP-89
Basin Electric Power Cooperative	Tioga, ND	230-kV	P-64
Bonneville Power Administration	Blaine, WA	2-500 kV	PP-10
	Nelway, WA	230-kV	PP-36
	Nelway, WA	230-kV	PP-46
Eastern Maine Electric Cooperative	Calais, ME	69-kV	PP-32
International Transmission Company	Detroit, MI	230-kV	PP-230
	Marysville, MI	230-kV	PP-230
	St. Clair, MI	230-kV	PP-230
	St. Clair, MI	345-kV	PP-230
Joint Owners of Highgate Project	Highgate, VT	120-kV	PP-82
Long Sault, Inc.	Massena, NY	2-115-kV	PP-24
Maine Electric Power Company	Houlton, ME	345-kV	PP-43
Maine Public Service Company	Limestone, ME	69-kV	PP-12
	Fort Fairfield, ME	69-kV	PP-12
	Madawaska, ME	138-kV	PP-29
	Aroostook, ME	2-69-kV	PP-29
Minnesota Power, Inc.	International Falls, MN	115-kV	PP-78
Minnkota Power Cooperative, Inc.	Roseau County, MN	230-kV	PP-61

¹ These Presidential permit numbers refer to the generic DOE permit number and are intended to include any subsequent amendments to the permit authorizing the facility.

Montana Alberta Tie Ltd.	Cut Bank, MT	230-kV	PP-305 ²
New York Power Authority	Massena, NY	765-kV	PP-56
	Massena, NY	2-230-kV	PP-25
	Niagara Falls, NY	2-345-kV	PP-74
	Devils Hole, NY	230-kV	PP-30
Niagara Mohawk Power Corp.	Devils Hole, NY	230-kV	PP-190
Northern States Power Company	Red River, ND	230-kV	PP-45
	Roseau County, MN	500-kV	PP-63
	Rugby, ND	230-kV	PP-231
Sea Breeze Olympic Converter LP	Port Angeles, WA	±450-kV DC	PP-299 ³
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	±450-kV DC	PP-76

² These transmission facilities have been authorized but not yet constructed or placed in operation.

³ These transmission facilities have been authorized but not yet constructed or placed in operation.